



March 24, 2017

In the Matter of Transition from TTY to Real-Time Text Technology  
CG Docket No. 16-145

Petition for Rulemaking to Update the Commission's Rules for  
Access to Real-Time Text Technology, and Petition for Waiver of  
Rules Requiring Support of TTY Technology  
GN Docket No. 15-178

### **REPLY COMMENTS OF KROWN MANUFACTURING**

Krown Manufacturing ("Krown") hereby submits these reply comments concerning the Further Notice of Proposed Rulemaking ("FNPRM") seeking comment on a variety of matters related to the transition from TTY to Real-Time Text ("RTT") technology. Krown congratulates the FCC on its recent ruling allowing wireless carriers to make RTT available to provide text based access to emergency communications. Krown believes that until RTT is available, proven, and universally adopted by the wireline industry, the requirement for TTY Baudot should not be abandoned. Furthermore, to abandon the requirement for TTY Baudot before the PSTN analog circuit-switched network is completely decommissioned nationwide will place many consumers at risk.

#### **I. BACKGROUND AND INTRODUCTION**

Krown, a deaf owned manufacturer, has been dedicated to improving the quality of life for people who are Deaf, Deaf Blind, Hard of Hearing and Speech Impaired by providing excellent telecommunication equipment (CPE) for individuals, businesses, and professionals in any place including the home, the workplace, and in all public facilities. As it has been its practice for over 30 years, Krown places consumers first, and believes that the FCC needs to carefully time the transition from TTY to RTT to coincide with the transition from circuit-switched analog PSTN to IP-based



telephony. This is absolutely necessary to ensure that no TTY user is left behind. Specifically for wireline communications, Krown encourages the Commission to retain the Baudot TTY requirements until

1. A full evaluation of the RTT standard along with other emerging IP based innovations has been conducted and
2. Until the circuit-switched analog PSTN has been completely decommissioned nationwide without exception to ensure consumer choice.

## **II. UNTIL RTT IS AVAILABLE, PROVEN AND WIDELY ADOPTED BY THE WIRELINE INDUSTRY, CONSUMERS SHOULD RETAIN CHOICE OF TTY AND OTHER EMERGING FORMS OF COMMUNICATION ACCESS**

Wireline industry innovation and consumer choice should be encouraged. Krown commends the FCC on the adoption of RTT for wireless providers especially to enable direct text based communications to emergency providers. While RTT has promise, it has not been proven as a reliable form of communication across the country, particularly for emergency communications. Krown believes that industry innovation for new technologies should continue to be encouraged so that RTT is not the only method of wireless and wireline access but rather an option available to consumers. The Commission and consumers might both be well served to encourage innovation rather than limiting solutions to legacy TTY or unproven RTT as the only text based communication options.

The way in which Deaf and Deaf Blind consumers contact family, friends, businesses and government agencies should not be limited to TTY or RTT as advances in technology become available. Even though the Commission has adopted TTY and RTT for the wireless industry as an option to achieve emergency communication access compliance, it remains to be seen if consumers will readily move from TTY to RTT technology. History is full of examples where consumers have not embraced



industry adoption of a particular standard or technology and businesses and consumer chose to go with other technologies.

Krown applauds the Commission for partnering with the wireless industry to arrive at a reasonable means for accommodating text based communication access through TTY and RTT. However, the Commission should take care not to phase out TTY Baudot capability and leave RTT as the only option to wireline customers. The probability that new technology will emerge over the next four (4) years is high. While RTT is the current proposed method of access for the wireless industry today, another technology may emerge as a better option for the wireline industry and consumers, by the time analog circuit-switched PSTN sunsets.

### **III. GOVERNMENT AGENCIES (TITLE II) AND BUSINESSES (TITLE III) OF THE AMERICANS WITH DISABILITIES ACT ARE NOT AWARE OF THE PROPOSED TRANSITION TO RTT**

The potential for confusion is great with a hurried transition to a new technology. As is evident in the Commission's recent request for comment related to the T-Mobile NPRM on RTT, there remains confusion about who should be responsible for the compatibility of RTT with TTY implemented with wireless carriers. Krown is in the business of selling CPE that provides for reasonable accommodations to consumers, government agencies and businesses including the hospitality Industry. Krown believes many state and local government agencies and businesses have the potential to be very confused with their obligations for telecommunications access. These government agencies and businesses are often unprepared for quick changes in technology because they are often unaware of rule changes, have not yet secured legislative appropriations or corporate funding to support new requirements which may be imposed, or are not aware of any new wireline CPE to meet new requirements. We are unaware of any who have implemented RTT signaling within their IP based telephony platforms at this time. These changes all place consumers



and the government agencies and businesses they contact at great risk of increased confusion over how to achieve telecommunications access to conduct normal day to day business.

Requiring TRS inclusion of RTT may not guarantee communication access for all consumers. Many government agencies and businesses often continue to refuse to accept telephone calls through any form of third party relay service providers for a variety of reasons including fear of fraud and instead require that the consumer contact them directly via TTY. A recent example of this problem involved Wells Fargo, which involved the settlement of numerous complaints. Consequently, the Commission needs to take into careful consideration that TRS consumers are sometimes denied access and are re-directed “to call directly on TTY” and that the government agency or business will most likely be unaware of RTT. The impact on wireline direct communications as a result of the wireless transition from TTY to RTT for consumers, government agencies and businesses needs to be considered so that consumers do not face new barriers to direct and indirect (TRS) communication.

Respectfully submitted,

By: *Alexis Kashar*

For: Krown Manufacturing

3408 Indale Road Fort Worth, Texas 76116

817 738-2485